

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	CASE NO. 25-30155
	§	
ALLIANCE FARM AND RANCH, LLC,	§	(CHAPTER 11)
	§	
DEBTOR	§	
	§	
IN RE:	§	CASE NO. 25-31937
	§	
ALLIANCE ENERGY PARTNERS,	§	(CHAPTER 11)
LLC,	§	
	§	
DEBTOR	§	

**MOTION FOR AUTHORITY TO REIMBURSE CHAPTER 11 TRUSTEE FOR
ADMINISTRATIVE EXPENSE**

THIS APPLICATION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE APPLICATION, YOU SHOULD IMMEDIATELY CONTACT THE APPLICANT TO RESOLVE THE DISPUTE. IF YOU AND THE APPLICANT CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE APPLICANT. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE APPLICATION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE APPLICATION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE APPLICATION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Tom A. Howley, duly appointed, qualified, and acting Chapter 11 Trustee (the “Trustee”) in the above-styled and numbered cause, and would respectfully show the Court that the following expense was paid by the Trustee with his own funds on May 27, 2025 in

obtaining a bond in a timely manner, as is required for the administration of the estate and Trustee requests authority for reimbursement of same:

International Sureties, LTD - \$6,795.00
Trustee Bond, attached hereto as **Exhibit A**.

This expense was paid by the Trustee using his own funds given the timing of the need for the bond to be posted. At the time, the Trustee did not have access to the operating account of the debtor. Therefore, the Chapter 11 Trustee is seeking approval for the reimbursement of this expense.

WHEREFORE, PREMISES CONSIDERED, Movant requests that after notice and an opportunity for a hearing, if needed, pursuant to the local rules and procedures of this Court, that the court approve the Trustee's request for reimbursement of this administrative expense in the amount of \$6,795.00 for Trustee bond.

Date: June 19, 2025.

Respectfully submitted,

CHAPTER 11 TRUSTEE

/s/ Tom A. Howley

Tom A. Howley

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CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2025, a copy of the foregoing Motion has been served via email to all parties registered for ECF notifications and via first-class mail to all parties on the attached creditor matrix on June 20, 2025.

/s/ Tom A. Howley

Tom A. Howley